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LOS ANGELES REGIONAL
6 INTEROPERABLE
COMMUNICATIONS SYSTEM
7 AUTHORITY

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11 **BEFORE THE HEARING BOARD OF THE**
12 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**
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14 In the Matter of
15 THE LOS ANGELES REGIONAL
INTEROPERABLE
16 COMMUNICATIONS SYSTEM
AUTHORITY

17 Petitioner, and,
18 SOUTH COAST AIR QUALITY
19 MANAGEMENT DISTRICT,

20 Respondent.
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CASE NO. 6234-7
FACILITY ID No.: 195322

DECLARATION OF NANCY YANG IN
SUPPORT OF THE LOS ANGELES
REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM
AUTHORITY'S APPLICATION FOR
INTERIM VARIANCE AND WAIVER OF
FEES

Date: May 27, 2025
Time: 9:30 AM
Place: 21865 Copley Drive
Diamond Bar, CA 91765

1 I, NANCY YANG, declare as follows:

2 1. I am employed by the County of Los Angeles, Internal Services Department, and
3 am on full-time loan to the Los Angeles Regional Interoperable Communications Systems (LA-
4 RICS) Joint Powers Authority (LA-RICS Authority) as a telecommunications system consulting
5 engineer. I have been in this position for the last 8 ½ years of the 12 years with the LA-RICS
6 Authority. I am familiar with and have reviewed the petition filed in support of Case No. 6234-7
7 and specifically with the equipment at issue in this petition, Internal Combustion (IC) Engine
8 Permit to Operate (P/O) No. G66628 located at 10875U Santa Clara Truck Trail, Canyon Country,
9 CA 91390. Unless otherwise indicated, the following facts are true of my own personal
10 knowledge and if called upon to testify, I could and would testify competently thereto.

11 2. The LA-RICS Authority is a Joint Powers Authority that is chartered to build and
12 operate the critical communications radio network, the LA-RICS' Land Mobile Radio (LMR)
13 System, which provides wireless communication services for Public Safety emergency personnel
14 throughout LA County and interoperates with local, State and Federal agencies.

15 3. The LMR System is a radio network dedicated entirely to first responders, such as
16 law enforcement, fire, and Emergency Management Services (EMS) personnel. The LMR System
17 creates a unified regional network of radio sites to provide communication services to first
18 responders. The network eliminates barriers that normally impede multi-jurisdictional responses
19 and allows police, firefighters and paramedics to communicate directly with other users outside of
20 their particular agency to streamline the response. Federal, State, and local agencies use the
21 network. The LMR System network was federally funded to include public-safety-grade
22 standards, with one specific attribute included that each site is backed-up by an emergency back-
23 up generator that will automatically start if the generator believes commercial power is lost at a
24 site.

25 4. The site at issue in this petition, LA-RICS Authority's LMR site in the Angeles
26 National Forest at 10875U Santa Clara Truck Trail, Canyon Country, CA 91390 (known as
27 "Magic Mountain Link" or "MML"), Facility ID No. 195322, is one such site where an emergency
28 back-up generator is used to ensure the site has power in the event commercial power is lost. This

1 emergency back-up generator is an Internal Combustion Engine, Cummins Model No. QSB5-G13,
2 Diesel-Fueled, 4-Cylinders, Turbocharged and Aftercooled, rated at 173 BHP, Driving an
3 Emergency Electrical Generator (also referred to as, "ICE" or "emergency back-up generator").
4 This emergency back-up generator is covered by Permit to Operate No. G66628. The LMR site is
5 located in a mountainous area that is difficult to reach and provides critical public safety coverage
6 over portions of the San Gabriel Valley and westward into the San Fernando Valley areas, and up
7 through the Angeles National Forest past Castaic. Those areas include population centers,
8 suburban communities, and forest and vegetated open spaces that are prone to wildfires during the
9 wildfire season, and dangerous mudslides during extreme wet weather conditions.

10 5. Unfortunately, MML sustained on January 7, 2025 a Southern California Edison
11 (SCE) Public Safety Power Shutoff (PSPS) with an accompanying Southcoast AQMD Executive
12 Order 25-01. The MML emergency generator ran for about 403 hours from January 8 to February
13 6 when Southcoast AQMD Executive Order 25-01 was in effect. The SCE PSPS occurred at the
14 same time that the Governor of California declared a State of Emergency on January 7, 2025
15 related to the extreme wind and fire events: [https://www.gov.ca.gov/wp-](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf)
16 [content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf).

17 6. Thereafter, a second significant SCE maintenance outage associated with a pole
18 upgrade performed by SCE occurred for multiple days. LA-RICS received notification on April
19 29, 2025 of an extended planned maintenance outage that was estimated to start on May 3, 2025 at
20 8:00 AM through May 9, 2025 at 10:00 AM, with an anticipated utility power outage of 146 hours
21 during which the MML IC Engine generator was expected to run to supply power and sustain
22 operation of the LMR System for its first responder users. Because LA-RICS was concerned that
23 if SCE implements the maintenance power outage as estimated, when utility power is restored and
24 the emergency generator stops on May 9 at 10:00 AM, the expected cumulative generator runtime
25 excluding the runs from January 8 to February 6, 2025 when Executive Order 25-01 was in effect,
26 would be 199 hours. Although it would still be below the 200-hour annual limit stipulated in
27 Condition No 4 of P/O G66628, there is a potential the runtime would have exceeded 200 hours in
28 the event the planned outage is further extended and is not restored as scheduled due to unforeseen

1 circumstances, and for future testing and maintenance of the MML IC Engine emergency
2 generator to maintain the equipment in good working order, and for future planned and unplanned
3 SCE maintenance outages.

4 7. In any event, as of May 2, 2025 when LA-RICS Authority filed its variance
5 application after 5:00 PM, the LPC emergency generator total year-to-date runtime was 455.8
6 hours. Generator runtime excluding the 403 hours that occurred from January 8 to February 6,
7 2025 when South Coast AQMD Executive Order 25-01 was in effect concurrent with multiple
8 extended SCE PSPS is 53 hours. The SCE PSPS and the SCE maintenance outage which
9 accounted for most of the MML emergency generator runtime are beyond LA-RICS Authority's
10 control. For the generator runtime as of May 2, only 2.3 hours are attributable to testing and
11 maintenance of MML's IC Engine generator.

12 8. Subsequent to May 2, SCE implemented additional maintenance outages. As of
13 May 21 at 9:00 AM, the total year-to-date generator runtime is now 573.9 hours, inclusive of the
14 generator runtime during SCE PSPS and Southcoast AQMD's Executive Order 25-01, or 171.1
15 hours excluding runtime when Executive Order 25-01 was in effect.

16 9. As of the current filing on May 21, 2025, the total year-to-date runtime has not yet
17 exceeded the permitted annual operating limit of 200 hours if runtime during Executive Order 25-
18 01's effective period is excluded. However, there is a potential that the 200-hour annual runtime
19 limit could be exceeded with future monthly testing and maintenance of the generator for the
20 remainder of 2025 and any additional planned or unplanned SCE power outages that last multiple
21 days. Under those scenarios, Site MML generator's runtime would exceed the limit stipulated in
22 Permit to Operate Condition No. 4 due to SCE's current and continued planned maintenance
23 outages and possible unforeseen, unplanned power outages between now and the end of the
24 calendar year.

25 10. Due to the importance of the LMR System and MML to the LMR System, it is
26 imperative to public safety that the network stays online with power through the emergency back-
27 up generator, even if there are SCE power outages so that our public safety entities will be able to
28 maintain critical communications services. The LMR System was used extensively by first

1 responders during the Palisades, Eaton and other recent wildfires. The LA-RICS Authority does
2 not want to shut off the emergency back-up generator. Losing power for the MML site would not
3 only hurt coverage for the localized area but would hurt system performance and reliability for the
4 rest of the county due to critical microwave links this site provides.

5 9. The LMR System radio network is required to stay “on air” 24/7 throughout the
6 year to support radio communications for the LA region’s first responders for law enforcement,
7 fire service, and emergency medical services. When commercial utility power from SCE is lost,
8 MML’s automatic transfer switch on the emergency back-up generator starts and activates the
9 generator to allow for a continual supply of electricity to maintain network operations until
10 commercial utility power can be restored. Unfortunately, because of the SCE Power Shutoff
11 (PSPS) and the second major maintenance outage from May 3 to May 9, 2025 which were beyond
12 LA-RICS Authority’s control that occurred in this year and accounted for the majority of
13 generator runtime to date, with the likelihood that LA-RICS Authority could exceed the 200 hour
14 limit for calendar year 2025.

15 10. In order to maintain compliance, we need a variance to exceed the 200-hour limit
16 this year. We are unable to control SCE's outage frequency and when they do maintenance on their
17 infrastructure. We can only monitor and request updates from SCE to confirm when power is
18 restored.

19 11. If LA-RICS is unable to operate the emergency generator during current and future
20 power outages for the year it would pose a major public safety risk. Emergency services rely on
21 the LA-RICS LMR System network for wireless communication extending throughout the remote
22 regions of Los Angeles County. Losing power for this site would not only hurt coverage for the
23 localized area but would hurt system performance and reliability for the rest of Los Angeles
24 County due to critical microwave links site MML provides. If a variance is not granted, the LA-
25 RICS Authority, being a mission-critical communications system which supports public safety
26 communications for daily operation and emergency responses by the Los Angeles region’s first
27 responders for law enforcement, fire, and emergency medical services, would have to incur
28 extensive fines and penalties.

1 12. The LA-RICS LMR System at the MML site is critical infrastructure for public
2 safety communications and emergency response, and the LA-RICS Authority cannot disable the
3 power infrastructure at the site.

4 13. The emergency back-up generator at the site is programed and setup to immediately
5 shut down upon restoration of commercial utility power using the automatic transfer switch
6 (ATS). Outside of routine startup testing, excess emissions will drop to zero upon restoration of
7 utility power. Test and maintenance of the MML IC Engine generator has been reduced to no
8 more than 1.0 hour a month since May 2025 in keeping with conditions in the approved
9 Emergency Ex Parte Variance.

10 14. Given the public safety need of providing a back-up supply of power to the MML
11 site in the event of an outage so public safety operations are not impacted, the LA-RICS Authority
12 is seeking the variance now because in the event of planned and unplanned power outages that last
13 multiple days which can easily cause the MML emergency generator to overrun its 200-hour
14 annual limit, and the time to evaluate the outage data and prepare for variance petition may not
15 allow petitions to be completed and submitted before the 200-hour limit is exceeded which would
16 be in violation of Condition 4 of the Permit to Operate for the site MML generator.

17 15. Without an interim variance, the LA-RICS Authority runs the risk to potentially
18 violate District rule 203(b), which requires compliance with conditions in the Permit to Operate
19 No. G66628.

20 17. The LA-RICS Authority is currently subject to the Emergency Ex Parte variance
21 conditions that were issued on May 7, 2025, which allows it to operate the ICE for 1.0 hours for
22 maintenance and testing time. But, the LA-RICS Authority will continue to require time to
23 maintain and test the ICE . Importantly, in case of an emergency, the LA-RICS Authority will
24 need additional hours beyond those already used during the calendar year.

25 18. I am aware of the information contained in the Proposed Findings and Decision of
26 the Hearing Board, and incorporate that information in this Declaration to the extent not already
27 presented. Moreover, I believe that information in the Proposed Findings and Decision of the
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1 Hearing Board to be true and accurate, such that if called as a witness, I could and would testify
2 competently thereto.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct, and that this declaration was executed on May 21, 2025 in Arcadia,
5 California.

6 BY: Nancy Yang
7 NANCY YANG
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